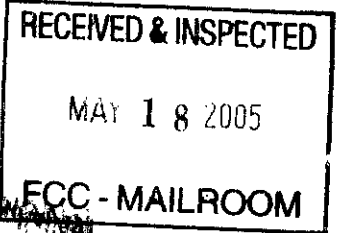


**South Slope Cooperative Telephone Company
d/b/a South Slope Wireless**

PO Box 19
980 North Front
North Liberty, IA 52317

May 12, 2005

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554



**Re: WT Docket No. 01-309
HAC Digital Wireless Telephones**

Semi-Annual Report

Dear Ms. Dortch:

The Filer, South Slope Cooperative Telephone Company - d/b/a South Slope Wireless, is the licensee of Broadband PCS Stations WPOL801 (A-Block, Partitioned Submarket 82, – Des Moines-Quad Cities MTA), WPOL802 (A-Block, Partitioned Submarket 86, – Des Moines-Quad Cities MTA), WPSF627 (A-Block, Partitioned Submarket 222, – Des Moines-Quad Cities MTA), WPWM732 (A-Block, Partitioned Submarket 262, – Des Moines-Quad Cities MTA) and WPZU774 (A-Block, Partitioned Submarket 270, – Des Moines-Quad Cities MTA). This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's *Report and Order* (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. The Filer's wireless system employs a GSM air interface and is configured to operate as part of the *i wireless* network. *i wireless* is headquartered in Urbandale, Iowa, and is a partnership between T-Mobile USA and Iowa Network Services ("INS"). The Filer currently markets a variety of Motorola and Nokia digital wireless handset models, among others. According to information obtained from the Cellular Telecommunications and Internet Association ("CTIA") AccessWireless web site (www.accesswireless.org) and other public sources, while there are handsets and devices designed to reduce interference with hearing aids, there do not currently appear to be any digital wireless handsets commercially available that meet ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility ("HAC") requirements of the *R&O*, the Filer is at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, must rely on the

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manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

Item 1 -- Digital Wireless Phones Tested: None. As described above, the Filer is a small carrier that is not involved in the handset development or testing process. The Filer will rely on testing performed by the handset manufacturers.

Item 2 -- Laboratory Used: None. See Response to Item 1.

Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item 1.

Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: The Filer has not identified any commercially available CDMA handsets that meet a U3 rating under ANSI Standard C63.19.

Item 5 -- Report On The Status Of Product Labeling: None. It is anticipated that product labeling will be handled by the handset manufacturers. In this regard, the Filer understands that **Motorola** and **Nokia** have been active on the ATIS Incubator for Hearing Aid Compatibility. Both companies participate in ATIS Working Group 6, which is addressing labeling and educational insert language issues. Working Group 6 is comprised of wireless manufacturers, carriers, and hearing-impaired user representatives, and is focused on creating a standard format for HAC labeling per FCC regulations that will educate consumers and allow hearing-impaired advocates to assist in consumer education.

In addition, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. While the 2001 version of the C63.19 standard uses a "U" rating for radiofrequency (RF) immunity and a "UT" rating for acoustic coupling, the 2005 version uses labeling that is consistent with the switches on hearing aids (*i.e.*, specifying "M" for Microphone and "T" for T-Coil). Because the revised labeling protocols are more likely to alleviate consumer confusion, we support industry requests for clarification that the 2005 labeling standards (the "M" and "T" ratings) can and should be used to designate HAC compatibility.¹

Item 6 -- Report On Outreach Efforts: The Filer has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate the Filer's employees and retail sales force about HAC-related issues and possible solutions. The Filer also understands that **Motorola** and **Nokia** have been involved in various outreach activities and each have developed web sites devoted to providing additional information about HAC. Links to these sites are provided below:

¹ See *Ex Parte* presentation by ATIS in WT Docket No. 01-309, (dated May 6, 2005).

<http://www.motorola.com/consumer/accessibility>.

<http://www.nokiaaccessibility.com/>

Item 7 -- Information Related To Retail Availability of Compliant Phones:

Upon information and belief, there are currently no handsets commercially available that meet a U3 rating under ANSI Standard C63.19. However, once such handsets become commercially available, the Filer will work with *i wireless* and T-Mobile to obtain an appropriate selection of handset models and to market them to current and potential subscribers. 100% of the handsets that *i wireless* carries have available accessories (adapters and neck loops) that allow the handsets to be used with TTY/TDD devices and hearing aids.

Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None. The Filer is a small carrier that is not involved in standards development.


Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: As noted above, the Filer currently offers a variety of GSM handsets. Upon information and belief, none of these handsets meet a U3 rating under ANSI Standard C63.19. However, each of these handsets has available accessories (adapters and neck loops) that allow the handsets to be used with TTY/TDD devices and hearing aids.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: None. The Filer is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

**SOUTH SLOPE COOPERATIVE TELEPHONE
COMPANY D/B/A SOUTH SLOPE WIRELESS.**

 5-13-05
J. R. Brumley